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March 6, 2013

**VIA ECF**

Honorable Viktor V. Pohorelsky  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201-1818

Re: *Precision Associates, Inc., et al. v. Panalpina World Transport (Holding) Ltd., et al.*, No. 08-cv-0042 (JG)(VVP)

Dear Magistrate Judge Pohorelsky:

Below is a proposed agenda for the March 7, 2013 status conference with Your Honor. Plaintiffs and Defendants have conferred and agree on the agenda items listed.

**Proposed Agenda for March 7, 2013 Status Conference**

1. Briefing schedule and page limits for motions to dismiss;
2. Plaintiffs' request for production of materials previously provided to government entities;
3. Defendants' views regarding item 2, including the appropriate process for resolving the request.

**Briefing Schedule Regarding Pending Motions to Dismiss**

All parties agree upon and respectfully propose the following briefing schedule on Defendants' pending motions to dismiss Plaintiffs' Third Consolidated Amended Complaint: Plaintiffs' responses to all motions to dismiss will be served on April 24, 2013; and Defendants' replies in support of their motions will be served on May 24, 2013.

**Page Limitations on Briefs Regarding Pending Motions to Dismiss**

All parties agree and respectfully propose that the page limitations for Plaintiffs' responses to Defendants' several motions will be the same for each response brief as the number of pages in the brief to which it is responding.

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For Defendants' reply briefs, Defendants request (and Plaintiffs do not oppose) half as many pages as the opening briefs or the Court's standard 10 page limit for replies, whichever is longer. After Defendants receive Plaintiffs' opposition briefs, if Defendants believe that additional pages will be necessary to respond, the parties will meet and confer in an effort to agree upon a reasonable request for additional pages for the reply briefs, and will make a request to the Court.

If the foregoing requests meet with the Court's approval, we respectfully request that Your Honor "So Order" this letter and direct it to the Clerk for filing.

Sincerely,

LOCKRIDGE GRINDAL NAUEN P.L.L.P.

/s/ W. Joseph Bruckner

W. Joseph Bruckner

c: All counsel of record (via ECF or U.S. Mail)